

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
TRENTON VICINAGE  
HONORABLE ZAHID Q. QURAISHI

UNITED STATES OF AMERICA :  
 :  
 v. : Criminal No. 22-318 (ZNQ)  
 :  
 GORDIAN NDUBIZU, :  
 :  
 Defendant. :

**NOTICE OF MOTION FOR BAIL PENDING APPEAL AND EXTEND SURRENDER**  
**DATE**

TO: Alexander E. Ramey, A.U.S.A.  
Ashley Pitts, A.U.S.A.  
Office of the United States Attorney  
District of New Jersey  
402 East State Street #430  
Trenton NJ 08608

PLEASE TAKE NOTICE that on a date and time to be set by the Court, Mark W. Catanzaro, Esquire, and Jerome A. Ballarotto, Esquire shall move before the Honorable Zahid N. Quraishi, United States District Court Judge, United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey for an Order granting him bail pending Appeal and extending his date to surrender.

Defendant shall rely upon the Certification of Counsel submitted with this Motion as well as a Memorandum of Law to be submitted within seven (7) days with the court's permission.

/s/Mark W. Catanzaro, Esquire

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/s/Jerome A. Ballarotto, Esquire

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*Attorney for Gordian Ndubizu*

Dated: April 15, 2025